

**Notice of Contingency Plan Changes
in Accordance with 20 NMAC 4.1.500
(40 CFR Part 264)**

**Waste Isolation Pilot Plant
Carlsbad, New Mexico**

November 5, 1999

**Notice of Contingency Plan Changes
in Accordance with 20 NMAC 4.1.500 (40 CFR Part 264)**

In accordance with requirements set forth in 20 NMAC 4.1.500 (hereafter referred to as 40 CFR Section 264.54) the Department of Energy is submitting revisions to the Waste Isolation Pilot Plant Contingency Plan. Section 264.54 of the regulations states;

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

- (a) Applicable regulations are revised;
- (b) The plan fails in an emergency;
- (c) The facility changes-in its design, construction, operation, maintenance, or other circumstances-in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- (d) The list of emergency coordinators changes; or
- (e) The list of emergency equipment changes.

In addition, copies of the revised contingency plan will be maintained at the facility and provided to outside entities as required by 40 CFR Section 264.53. The list of locations where the contingency plan is located has not been revised from those locations currently shown in the plan.

The revisions contained in this notification are consistent with those required in 40 CFR 264.54 (c) and (d). The revisions to the plan for which notification is required in 264.54 (c) are changes which reflect the hazards associated with the facility upon the receipt of transuranic mixed waste, while the changes required by 264.54 (d) are self explanatory. Other changes have been made at this time to clarify certain sections and ensure that they are consistent throughout the operational descriptions for the facility.

Changes are listed in Table 1. Listed information includes a reference to the applicable section of the contingency plan and a brief description of the change. Attachment 1 provides a more detailed description of the changes along with providing a basis for the change. Finally, a revised contingency plan is attached incorporating the specified changes.

Table 1. RCRA Contingency Plan Changes

No.	Affected Section of Contingency Plan	Change
1.	F-2, F-6, & F-9	Editorial changes to the contingency plan in order to reflect current role of First Line Initial Response Team (FLIRT) and properly identify parties of MOU with the DOE.
2.	Table F-1	Revise Table 1 “Hazardous Substances in Large Enough Quantities to Constitute a Level II Incident” to include new materials.
3.	Table F-2	Revise Table 2 “Resource Conservation and Recovery Act Emergency Coordinators” to reflect current list of emergency coordinators.
4.	Table F-6	Revise description of site-wide evacuation alarm.
5.	Figure F-1 Figure F-1a Figure F-6 Figure F-8	Revise figures to reflect current building configuration on-site.
6.	Figure F-10 Figure F-10a Figure F-11 Figure F-11a	Revise figures to more accurately reflect location of fire hydrants and post-indicator valves.

Attachment 1

Detailed Descriptions of RCRA Contingency Plan Changes

Change - 1

Description:

- A. In section F-2, page 9, Response Personnel under the subheading of First Line Initial Response Team (FLIRT) delete sentence beginning “No fire response beyond . . .”
- B. In section F-6, page 41, under COORDINATION OF AGREEMENTS delete “Columbia (formerly Lea)” and replace with “Lea”.
- C. In section F-9, page 46 LOCATION OF THE CONTINGENCY PLAN AND PLAN REVISION Delete “Columbia (formerly Lea)” and replace with “Lea”.

Basis:

- A. Better defines Facility Shift Manager (FSM) rolls during crisis management operations. Allows FLIRT to respond to fires beyond the incipient stage during an emergency.
- B. Incorporate proper reference from the Memorandum of Understanding (MOU) to the LEA Regional Hospital. The name of the facility has changed since the last revision of contingency plan.
- C. See above.

A. Page 9.

First Line Initial Response Team (FLIRT) - Supplemental primary responders in the event of a general underground emergency for medical and HAZMAT response. ~~No fire response beyond the incipient stage will be performed by the FLIRT.~~ The FLIRT also provides backup support for the ERT in the event of a general surface-facility emergency. FLIRT members are part of the WIPP Supplemental Emergency Response Program.

B. Page 41

An MOU between the DOE and the ~~Columbia (formerly Lea)~~ Regional Hospital Emergency Radiological Treatment Center for the WIPP (February 15, 1995) provides for the treatment of radiologically contaminated personnel who have incurred injuries beyond the treatment capabilities at the WIPP facility. The DOE will provide transport of the patient(s) to the ~~Columbia~~ Lea Regional Hospital Emergency Radiological Treatment Center for decontamination and medical treatment.

C. Page 46

LOCATION OF THE CONTINGENCY PLAN AND PLAN REVISION

The owner/operator of the WIPP facility will ensure that copies of this plan are present at controlled-document locations throughout the facility and are, consequently, available to all emergency personnel and organizations described in Section 3. In addition, the owner/operator will make “information only” copies available to the following outside agencies when a change is made to the plan:

Mississippi Potash Inc., Western Agriculture Minerals, IMC Fertilizer, Eddy Potash Inc., and New Mexico Potash

New Mexico Energy, Minerals, and Natural Resources Department for Alternate EOC at the Living Desert State Park Office, Carlsbad

Carlsbad Fire Department, Carlsbad

Columbia Medical Center, Carlsbad

~~Columbia~~ Lea Regional Hospital, Hobbs

Otis Fire Department, Otis

Hobbs Fire Department, Hobbs

Joel Fire Department, Carlsbad

Change - 2

Description:

Revise Table F-1 “Hazardous Substances in Large Enough Quantities to Constitute a Level II Incident” on page 51, to include:

One Standard Waste Box or two or more 55 gallon drums of CH TRU Waste, and

Hazardous materials in quantities that exceed 5 times the Reportable Quantity (Per DOE O 151.1) values as defined in 40 CFR 302.

Basis:

These changes are required by 40 CFR 264.54 to reflect changes in operation that alter the potential for releases of hazardous substances. They will reflect the hazards associated with the receipt of transuranic mixed waste.

Table F-1. Hazardous Substances in Large Enough Quantities to Constitute a Level II Incident

CHEMICAL DESCRIPTION	BUILDING LOCATION	HAZARD CATEGORY
Ethylene Glycol Solution - 35%	Buildings 411; 412; 451; 452; 486; 463; 474C; FAC 414	Immediate (acute) Delayed (chronic)
Gasoline, Unleaded GASC0001	FAC 480	Fire Immediate (acute) Delayed (chronic)
No. 1 Diesel Fuel Oil GASC0210	S-1300 Maint Shop U/G; FACs 480, 255.1 & 255.2; Transport Tank; Building 456 Trailer 911F	Fire Immediate (acute) Delayed (chronic)
One Standard Waste Box or two or more 55 gallon drums of CH TRU Waste	WHB Waste Shaft U/G	Delayed (chronic)
Hazardous materials in quantities that exceed 5 times the Reportable Quantity (Per DOE O 151.1) values as defined in 40 CFR 302	It should be noted that WIPP is not expected to possess such quantities.	Fire Immediate (acute) Delayed (chronic)

Change - 3

Description:

Revise Table F-2 “Resource Conservation and Recovery Act Emergency Coordinators” on page 52 to reflect the current list of emergency coordinators.

Basis:

Update of information on Emergency Coordinators as required by 40 CFR 264.54(d).

**TABLE F-2
RESOURCE CONSERVATION AND RECOVERY ACT
EMERGENCY COORDINATORS**

Name	Address*	Office Phone	Home Phone*
G. A. (Gerry) Burns (primary) ¹		234-8276 or 234-8635	
R. A. (Richard) Marshall (primary) ¹		234-8276 or 234-8695	
K. (Kim) Jackson (primary) ¹		234-8276 or 234-8453	
M. L. (Tex) Winans (primary) ¹		234-8276 or 234-8273	
G. L. (Garrod) Ashford ²		234-8272	
R. C. (Russ) Stroble ²		234-8554	
E. R. (Ed) Flynn ²		234-8272 or 234-8276	
G. L. (Gary) Kessler ²		234-8326	
A. E. (Alvy) Williams ²		234-8216 or 234-8276	
P.J. (Paul) Paneral ²	218 Parker	234-8498	887-3395
M..L. (Mark) Long ²	1013 N. Guadalupe	234-8107	887-6677
D.A. (David) Frye	1003 Octotillo Canyon	234-8272	887-7045

¹ The on-duty Facility Shift Manager is the primary RCRA Emergency Coordinator pursuant to 20 NMAC 4.1.500 (incorporating 40 CFR '264.52), and is designated to serve as the RCRA Emergency Coordinator.

² The on-duty Facility Operations Engineer is the alternate RCRA Emergency Coordinator and is available as needed.

Change - 4

Description:

Delete the words, "supplement audible alarm in high ambient noise areas" in the Sitewide Evacuation Alarm description in Table F-6 under Communications on page 56 . This section should read "...flashing strobe lights: radios and/or pagers..." .

Basis:

This change will be more protective of the workers as is will eliminate the conflict between the public address system, the horns, and strobe lights in the underground. Use of strobes is the primary method for notification of personnel in high ambient noise areas in the underground. This will remain consistent with the description of alarms for the underground provided in Section E1a(1) of the permit. Changes to the list of emergency equipment must be forwarded per the requirements of 40 CFR 264.54(e).

**TABLE F-6
EMERGENCY EQUIPMENT MAINTAINED AT THE WASTE ISOLATION
PILOT PLANT**

Equipment	Description and Capabilities	Location
Communications		
Building Fire Alarms	Manual pull stations and automatic devices (sprinkler system flow, and smoke and thermal detectors) trigger fire alarm; locally visible and audible; visual display and alarm in Central Monitoring Room (CMR)	Guard and Security Building, Pumphouse, Warehouse/Shops, Exhaust Filter Building, Support Building, CMR/ Computer Room, Waste Handling Building, TRUPACT Maintenance Facility, SH Hoisthouse, Maintenance Shops, Guard Shack*, Auxiliary Warehouse, Core Storage Building, Engineering Building, Training Facility, Safety Building, Maintenance Shop, Hazardous Waste Storage (non-TRU) Area (Facility 474) *local alarms; not connected to the CMR
Underground Fire Alarms	Automatic/Manual; have priority over other paging channel signals but not override intercom channels; alarms sound in the general area of the control panel and are connected to the underground evacuation alarms; they also interface with the CMR.	Fire detection and control panel locations: Waste Shaft, SH Shaft, Panel 1 (outside room 1), E-O/N-1200, Fuel Station #2

TABLE F-6
EMERGENCY EQUIPMENT MAINTAINED AT THE WASTE ISOLATION
PILOT PLANT

Equipment	Description and Capabilities	Location
Site-wide Evacuation Alarm	Transmitted over paging channel of the public address system, overriding its normal use; manually initiated according to procedures requiring evacuation; audible alarm produced by tone generator at 10 decibels above ambient noise level (or at least 75 decibels); flashing strobe lights supplement audible alarm in high ambient noise areas ; radios and/or pagers are used to notify facility personnel outside alarm range. Monthly test are performed on the PA, site notification alarms, and plectrons.	Site-wide

Change - 5

Description:

The following figures have been changed to reflect the current building configuration on-site;

Figure F-1 WIPP Surface Structures

Figure F-1a Legend to Figure 1

Figure F-6 Firewater Distribution System

Figure F-8 WIPP On-Site Assembly Areas and WIPP Staging Areas

See attached revised figures.

Basis:

These figures were changed as a result of the fact that certain, non-essential, trailers were removed from the site. As such, it is no longer necessary to show them on the figures.

Attachments:

Revised Figure F-1

Revised Figure F-1a

Revised Figure F-6

Revised Figure F-8

Change - 6

Description:

Figure F-10 Waste Handling Building Pre-Fire Survey (First Floor) has been revised and Figure 10a Waste Handling Building Pre-Fire Survey (First Floor - Fire Hydrant/Post Indicator Location) has been added.

Figure F-11 Waste Handling Building Pre-Fire Survey (Second Floor) has been revised and Figure 11a Waste Handling Building Pre-Fire Survey (Second Floor - Fire Hydrant/Post Indicator Location) has been added.

Add Figure F-10a and Figure F-11a to the list of figures.

Basis:

Revised figures more accurately reflect the current configuration of the site and provide more detail with regard to the location of fire hydrants and post indicator valves.

Attachments:

Figure F-10
Figure F-10a
Figure F-11
Figure F-11a

Figure F-10. Waste Handling Building Pre-Fire Survey (First Floor)

Figure F-10a. Waste Handling Building Pre-Fire Survey
(First Floor - Fire Hydrant/Post Indicator Location)

Figure F-11. Waste Handling Building Pre-Fire Survey (Second Floor)

Figure F-11a. Waste Handling Building Pre-Fire Survey

(Second Floor - Fire Hydrant/Post Indicator Location)